

**REMARKS**

Claims 1-10 have been examined on their merits, and are all the claims presently pending the application.

1. Claims 1-8 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Wang *et al.* (U.S. Patent No. 67,230,024) in view of Mohebbi *et al.* (U.S. Patent No. 6,925,303). Applicants respectfully traverse the § 103(a) rejection of claims 1-8 for at least the reasons discussed below.

Wang *et al.* disclose, *inter alia*, a mobile station and a base station that allow an ongoing voice call to be converted to a digital fax call without forcing the user to relinquish the line and to reestablish a call for the purposes of transmitting digital fax. As shown in Figure 1 of Wang *et al.*, a fax capable digital terminal 102 is connected to a mobile station 104. The mobile station 104 communicates with a base station 112, which in turn, communicates with an MSC 120. The MSC 120 is coupled to a fax machine 124 through a public switch telephone network (PSTN) 128. Wang *et al.* further disclose that the signal is converted during an ongoing call between already coupled fax capable digital terminal 102 and the fax machine 124, therefore obviating any terminal device selection. Furthermore, the Patent Office has acknowledged that Wang *et al.* fail to teach or suggest that the base station 112 and the fax machine 124, communicating with the base station 112 via the PSTN 128, are in the same cell of a cellular telecommunications system.

The Patent Office has acknowledge that Wang *et al.* fail to teach or suggest the use of multiple cells, and also fail to teach or suggest the application of rules at a computer to select a terminal to forward a process command thereto. The Patent Office argues that Mohebbi *et al.* overcome the acknowledged deficiencies of Wang *et al.*

The Patent Office states that Mohebbi *et al.* disclose, *inter alia*, a cellular network that comprises two different base stations and a mobile station that receives downlink signaling from one of the base stations, and that Mohebbi *et al.* further disclose the specification selection of one of the base stations to be used to transmit the downlink signal. The disclosure of Mohebbi *et al.* states that a decision unit decides which base station to use to reduce network interference arising from transmission of the downlink signal.

The combination of Wang *et al.* and Mohebbi *et al.* fail to teach or suggest at least applying rules at a computer to select a terminal device resident in the cell controlled by a base station that received a radio signal, wherein the terminal device is located in the same cell at the time a wireless telecommunications device generated the process command, as recited in amended claim 1. Combining of Mohebbi *et al.* with Wang *et al.* does not overcome the deficiencies of Wang *et al.*, in that Mohebbi *et al.* is directed to the selection of a base station to reduce network interference on the transmission of a downlink signal. Mohebbi *et al.* is silent with respect to selecting terminal devices connected to another network (different from the cellular network) to receive process commands generated by a wireless communication device that is present within a particular cellular network cell. Thus, Applicants submit that the

combination of Wang *et al.* and Mohebbi *et al.* does not fulfill the “all limitations” prong of a *prima facie* case of obviousness with respect to amended claim 1.

Since neither reference teaches or suggests at least the terminal device selection feature recited in amended claim 1, Applicants submit that the combination of Wang *et al.* and Mohebbi *et al.* does not fulfill the motivation prong of a *prima facie* case of obviousness with respect to amended claim 1.

Based on at least the foregoing reasons, Applicants submit that claim 1 is in condition for allowance over the combination of Wang *et al.* and Mohebbi *et al.*, and further submit that claims 2-8 are allowable as well, at least by virtue of their dependency from claim 1. Applicants respectfully request that the Patent Office reconsider and withdraw the § 103(a) rejection of claims 1-8.

2. Claims 9 and 10 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Wang *et al.* in view of Baker *et al.* (U.S. Patent No. 6,195,545). Applicants respectfully traverse the § 103(a) rejection of claims 9 and 10 for at least the reasons discussed below.

As discussed above with respect to claim 1, Wang *et al.* disclose, *inter alia*, a mobile station and a base station that allow an ongoing voice call to be converted to a digital fax call without forcing the user to relinquish the line and to reestablish a call for the purposes of transmitting digital fax. Wang *et al.* further disclose that the signal is converted during an ongoing call between already coupled fax capable digital terminal 102 and the fax machine 124, therefore obviating any terminal device selection. Furthermore, the Patent Office has

acknowledged that Wang *et al.* fail to teach or suggest that the base station 112 and the fax machine 124, communicating with the base station 112 via the PSTN 128, are in the same cell of a cellular telecommunications system.

Baker *et al.* disclose, *inter alia*, a proximity-based registration in a business communication system including an enterprise switch which directs calls from one or more incoming trunks to various user terminals, such that a mobile station can be registered to different complex system terminals (*e.g.*, a complex wireless terminal 123, a deskset 126 and an advanced terminal 127 in Fig. 1) as it moves between different cells of the system to get permission to utilize the functions of these terminals. Baker *et al.* fail to teach the recited processing means which performing a selection between terminals. To receive permission to utilize the functions of a complex system terminal, a mobile station in the Baker system must be registered to the complex system terminal first, and, Baker *et al.*, the complex system terminal is chosen by the mobile station user, not by the enterprise switch.

The combination of Wang *et al.* and Baker *et al.* fail to teach or suggest at least processing means that select a terminal device located in the same cell as a wireless telecommunications device at the time the process command was generated on the wireless telecommunications device, and forwarding at least part of the process command to the selected terminal device, as recited in amended claim 9. While Baker *et al.* might overcome Wang *et al.*'s deficiency with respect to a wireless device connecting to a complex system terminal located in the same wireless cell, the combination still lacks any teaching or suggestion of selecting a terminal device in a wireless cell being performed on the basis of the presence of a

wireless telecommunications device being in the same wireless cell. The combination of Wang *et al.* and Baker *et al.* require affirmative steps on the part of the user of the wireless telecommunications device to access a complex system terminal, whereas the present invention relies upon a computer routing the process command to the appropriate terminal device based on cell location, without user intervention. Thus, Applicants submit that the combination of Wang *et al.* and Baker *et al.* does not fulfill the “all limitations” prong of a *prima facie* case of obviousness with respect to amended claim 9.

Since neither reference teaches or suggests at least the terminal device selection feature of amended claim 9, Applicants submit that the combination of Wang *et al.* and Baker *et al.* does not fulfill the motivation prong of a *prima facie* case of obviousness with respect to amended claim 9.

Based on at least the foregoing reasons, Applicants submit that claim 9 is in condition for allowance over the combination of Wang *et al.* and Baker *et al.*, and further submit that claim 10 is allowable as well, at least by virtue of its dependency from claim 9. Applicants respectfully request that the Patent Office reconsider and withdraw the § 103(a) rejection of claims 9 and 10.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. APPLICATION NO. 09/875,890  
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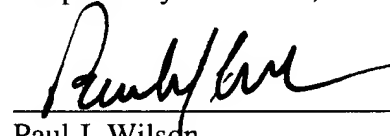
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**23373**

CUSTOMER NUMBER

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul J. Wilson", is written over a horizontal line.

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